



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

AMY ROBINSON  
Senior Counsel  
arobinso@law.nyc.gov  
Phone: (212) 356-3518  
Fax: (212) 356-1148

**By ECF**

June 10, 2022

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,  
No. 20 Civ. 8924 (CM) (GWG)  
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. I write in accordance with Rule 2.A of the Court's Individual Practices to respectfully advise the Court of two deadlines pertaining to the Court's Order dated May 16, 2022, (Dkt. No. 541).

First, in the Court's Order, defendants were directed in the second numbered paragraph that, "[b]y May 27, 2022, the City shall provide Bates numbers for any responsive ARGUS videos that have already been produced through CCRB or IAB files, and identify the related protest, date, and time of the footage." Defendants provided a spreadsheet containing ARGUS footage that has been produced, including the date, location and Bates stamp number for CCRB files on June 8, 2022. We sought an extension from Plaintiff to provide similar information for IAB files. Plaintiffs asked that the information be provided by June 15, 2022.

Second, in the Court's Order, defendants were directed in the third numbered paragraph that, "[i]n the event the City produces no ARGUS footage for one or more of the plaintiff-provided maps, by June 3, 2022, the City shall provide to plaintiffs a sworn statement from an individual with personal knowledge stating whether the non-production was due to the absence of operating cameras in the identified area or to defendants' failure to preserve the video." Plaintiffs alerted defendants to this missed deadline on Monday, June 6, 2022, and extended the time to respond to Wednesday. Defendants produced the sworn statement to plaintiffs on Wednesday.

Defendants apologize for the lateness of this notification. We also note for the Court that with respect to the first part of the Court Order regarding production of thousands of hours of

ARGUS footage and Bates numbers, that was produced by the May 27, 2022 Court-ordered deadline.

Thank you for your attention to this matter.

Respectfully submitted,

*Amy Robinson s/*  
Amy Robinson  
Senior Counsel

cc: ALL COUNSEL (*via* ECF)